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September 1, 2005

**BY ELECTRONIC COMMENT FILING SYSTEM**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Report on Implementation of Wireless Enhanced 911 Phase II  
Automatic Location Identification (ALI) of ComScape  
Telecommunications of Raleigh-Durham License, Inc. for Station  
KNLG699 and of ComScape Telecommunications of Wilmington  
License, Inc. for Station KNLG700  
CC Docket No. 94-102**

Dear Ms. Dortch:

On behalf of ComScape Telecommunications of Raleigh-Durham License, Inc. (“ComScape Raleigh-Durham”) and ComScape Telecommunications of Wilmington License, Inc. (“ComScape Wilmington”) (both companies collectively referred to as “ComScape”), and pursuant to *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket No. 94-102, Order, FCC 05-79 released April 1, 2005, at para. 172, we hereby submit their Report on Implementation of Wireless Enhanced 911 Phase II Automatic Location Identification (“ALI”) Systems in CC Docket No. 94-102.

**Background/Contact Information**

**Carrier Identifying Information**

Carrier Name: ComScape Telecommunications of Raleigh-Durham License, Inc.  
Carrier FRN: 0003013398  
Carrier Name: ComScape Telecommunications of Wilmington License, Inc.  
Carrier FRN: 0003013372

**The name, title, address, telephone number, facsimile number and e-mail address of the person or persons responsible for the carrier report**

Name: Chaku Patel  
Title: Vice President of Engineering and Management Information Services  
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**Interim Report**

**(1) The number of Phase I and Phase II requests received from Public Safety Answering Points (PSAPs) (including those the carrier may consider invalid) and the status of those requests, including whether the carrier and the PSAP have reached an alternative date**

ComScape has not received any PSAP requests.

**(2) The carrier's specific technology choice**

ComScape has chosen a handset-based solution that utilizes assisted Global Positioning System ("GPS") handsets to provide Automatic Location Identification ("ALI") for Phase II E911 Services. This technology was chosen based on its accuracy, service availability, and ease of implementation that will best serve the customer's public safety needs. ComScape utilizes Code Division Multiple Access ("CDMA") for its air interface.

**(3) Status on ordering and/or installing necessary network equipment**

It is ComScape's intent to order and install the necessary network equipment such that ComScape can provide E911 Phase II service to each PSAP within six months of each valid PSAP request for Phase II service.

**(4) The date on which Phase II service was/will first be available in the carrier's network**

It is ComScape's intent that E911 Phase II service first be available on its network within six months of each valid PSAP request for Phase II service.

**(5) If the carrier is pursuing a handset-based solution:**

**(a) Whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets**

ALI-capable handsets are available, ComScape has obtained them and will continue to obtain them. All of ComScape's new activations have ALI-capable handsets.

**(b) Information on the carrier's progress towards ensuring that ninety-five percent of its subscriber base has location-capable handsets**

At least ninety-five percent of ComScape's embedded customer base already has ALI-capable handsets.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/

Eliot J. Greenwald